

Waste Pro of South Carolina, Inc. (ECF No. 39), and Waste Pro of North Carolina, Inc. (ECF No. 40) (collectively, the “Motions to Dismiss”). Plaintiffs’ initial deadline to respond to the Motions to Dismiss was January 3, 2018 and was originally extended to January 12, 2018 (ECF No. 43).

3. Plaintiffs seek a second brief extension of two business days to Tuesday, January 16, 2018 to file their responses. This extension is sought in order to have sufficient time to complete and finalize the four separate responses to the Motions to Dismiss and to have all declarations which will be attached as exhibits properly executed.

4. Defendants are unopposed to the extension of time and have no objection to Plaintiffs’ request to respond to the Motions to Dismiss on or before January 16, 2018. Counsel for the Plaintiff, Ryan Morgan, spoke and communicated with Counsel for Defendants, Amy Tingley, on January 11, 2018 confirming same.

5. Plaintiffs respectfully request that the Court grant this motion and grant Plaintiffs an extension of time to January 16, 2018 to respond to the Motion to Dismiss for Lack of Jurisdiction and for Failure to State a Claim filed by Waste Pro USA, Inc. (ECF No. 37), Waste Pro of Florida, Inc. (ECF No. 38), Waste Pro of South Carolina, Inc. (ECF No. 39), and Waste Pro of North Carolina, Inc. (ECF No. 40). Plaintiffs also request all other proper relief which may be available.

Respectfully submitted by:

LE CLERCQ LAW FIRM, P.C.

By: /s/ Ben Whaley Le Clercq

Ben Whaley Le Clercq, Esq.

Fed. Bar # 7453

708 S. Shelmore Suite 202

Mt. Pleasant, SC 29464

(843) 722-3523

Ben@leclercqlaw.com

And

MORGAN & MORGAN, P.A.

C. Ryan Morgan, Esq.

FBN 0015527

N. Orange Ave., 16th Floor

P.O. Box 4979

Orlando, FL 32802-4979

Telephone: (407) 420-1414

Facsimile: (407) 867-4791

Email: rmorgan@forthepeople.com

pro hac vice application pending

Paul M. Botros, Esq.

FBN 0063365

600 N. Pine Island Road.

Suite 400

Plantation, FL 33324

Telephone: (954) 327-5352

Facsimile: (954) 327-3017

Email: pbotros@forthepeople.com

pro hac vice application pending

Trial Counsel for Plaintiffs and Putative Class Members

And

ANDERSON2X, PLLC

Austin W. Anderson, Esq.

Federal I.D. No. 777114

Texas Bar No. 24045189

austin@a2xlaw.com

pro hac vice application pending

Clif Alexander, Esq.

Federal I.D. No. 1138436

Texas Bar No. 24064805

clif@a2xlaw.com

819 N. Upper Broadway

Corpus Christi, Texas 78401

Telephone: (361) 452-1279

Facsimile: (361) 452-1284

pro hac vice application pending

**ATTORNEYS IN CHARGE FOR PLAINTIFFS AND
PUTATIVE CLASS MEMBERS**

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2018 I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of South Carolina, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Ben Whaley Le Clercq
Ben Whaley Le Clercq, Esq.